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Nathan Ochsner, Clerk of Court

May 1, 2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JOHN IMADE

§
§
§
§

CRIMINAL NO. **4:25-cr-0221**

UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times material to this Indictment:

The Defendant

1. Defendant JOHN IMADE was a resident of Houston, Texas.
2. JOHN IMADE owned several bank accounts which included accounts at First National Bank of Texas, BB&T Bank now Truist Financial, Prosperity Bank, Bank of Texas, and Woodforest National Bank.

COUNTS ONE THROUGH SIX
(Laundering of Monetary Instruments)

3. Paragraphs 1 through 2 are re-alleged and incorporated by reference as though fully set forth herein.
4. On or about the dates set forth below, in the Southern District of Texas and elsewhere, defendant,

JOHN IMADE,

did knowingly conduct and attempt to conduct the financial transactions described below, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that

is, wire fraud, a violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity, as follows:

COUNT	DATE	FINANCIAL TRANSACTION
One	May 2, 2020	Withdrawal of \$4,640 from First National Bank of Texas account ending in 7829.
Two	August 4, 2020	Withdrawal of \$503 from BB&T Bank, now Truist Financial, account ending in 6973.
Three	August 5, 2020	Withdrawal of \$503 from BB&T Bank, now Truist Financial, account ending in 6973.
Four	May 3, 2022	Withdrawal of \$6,500 from Prosperity Bank account ending in 4697.
Five	June 24, 2022	Withdrawal of \$2,000 from Prosperity Bank account ending in 4697.
Six	June 24, 2022	Withdrawal of \$7,000 from Prosperity Bank account ending in 4697.

Each in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS SEVEN THROUGH TEN
(Laundering of Monetary Instruments)

5. Paragraphs 1 through 2 are re-alleged and incorporated by reference as though fully set forth herein.

6. On or about the dates set forth below, in the Southern District of Texas and elsewhere,

defendant,

JOHN IMADE,

did knowingly conduct and attempt to conduct the financial transactions described below, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, mail fraud, a violation of Title 18, United States Code, Section 1341, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity, as follows:

COUNT	DATE	FINANCIAL TRANSACTION
Seven	May 5, 2020	Withdrawal of \$8,000 from Woodforest National Bank account ending in 3577.
Eight	May 6, 2020	Withdrawal of \$8,000 from Woodforest National Bank account ending in 3577.
Nine	March 11, 2024	Withdrawal via check of \$2,333 from Bank of Texas account ending in 5305.
Ten	March 11, 2024	Withdrawal of \$8,500 from Bank of Texas account ending in 5305.

Each in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to defendant,

JOHN IMADE,

that in the event of his conviction of any of the offenses charged in Counts One through Ten of this Indictment, all property, real or personal, involved in money laundering offenses or traceable to such property, is subject to forfeiture.

Money Judgment

Defendant is notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant is notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the Defendant up to the total value of the property subject to forfeiture.

A TRUE BILL:

Original Signature on File

Foreperson of the Grand Jury

NICHOLAS J. GANJEI
United States Attorney

By: Rodolfo Ramirez
Rodolfo Ramirez
Assistant United States Attorney